

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

HASBRO, INC.,

Plaintiff,

-against-

INFOGRAMMES ENTERTAINMENT, S.A. a/k/a
ATARI, S.A.,

Defendant.

C.A. No. 09 Civ. 610 (S) (LDA)

SUPPLEMENTAL DECLARATION OF JAMES M. PEARL

I, James M. Pearl, declare and state:

1. I am a member of the State Bar of California and am admitted to practice before the Courts of that State and the Central District of California. I am admitted *pro hac vice* to the District of Rhode Island. I am a partner of the law firm of O'Melveny & Myers LLP, counsel of record for Plaintiff and Counterclaim-Defendant Hasbro, Inc. ("Hasbro"), in the above-captioned action. I submit this supplemental declaration in support of Hasbro's Motion to Compel Production of Documents ("Motion") from defendants Atari, S.A., Atari Interactive, Inc., and Atari, Inc. (collectively, "Atari"). I have personal knowledge of the matters stated herein, and I could and would testify competently to them if called as a witness.

2. Attached hereto as Exhibit 1 is a true and correct copy of an April 15, 2010 email communication from Hasbro's counsel, Todd White, to Atari's counsel, Kyle Bisceglie.


3. Attached hereto as Exhibit 2 is a true and correct copy of Atari's First Set of Requests for the Production of Documents ("First Requests"), served on Hasbro on August 13, 2010.

4. Attached hereto as Exhibit 3 is a true and correct copy of Atari's First Set of Interrogatories ("First Interrogatories"), served on Hasbro on October 15, 2010.

5. Attached hereto as Exhibit 4 is a true and correct copy of Atari's Second Set of Requests for the Production of Documents ("Second Requests"), served on Hasbro on December 17, 2010.

6. Atari's First and Second Requests and First Interrogatories requested that Hasbro provide documents and information on a variety of subjects ranging over a more than five-year timeframe of 2005 to present. In response to this discovery, Hasbro agreed to produce responsive, non-privileged documents and provide information falling within the date range specified by Atari.

Executed in Los Angeles, California on this 4th day of February 2011.

By: 
James M. Pearl

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of February 2011, an electronic copy of the within document was served upon the following counsel of record via the PACER/ECF system:

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/s/ Todd D. White
Todd D. White